

# **Exhibit C**

**From:** Geller, Joshua  
**Sent:** Tuesday, December 31, 2024 2:23 PM  
**To:** Marc Wolstenholme  
**Cc:** Moss, Aaron  
**Subject:** Wolstenholme v. Riot Games - Rule 7-3 Meet and Confer

Dear Mr. Wolstenholme,

I'm writing to let you know about some upcoming steps that Riot intends to take in your case and to clarify a few procedural points.

First, Riot plans to remove the case from Los Angeles Superior Court to the United States District Court for the Central District of California, pursuant to 28 U.S.C. § 1441. This is because you're asserting a claim for copyright infringement, which federal law requires to be heard and decided exclusively in federal court. Your complaint was filed in state court (Los Angeles Superior Court), which does not have jurisdiction over copyright claims.

Once the case is in federal court, Riot intends to file a motion to dismiss for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) or, in the alternative, for a more definite statement under Federal Rules of Civil Procedure 12(e). We are writing to "meet and confer" with you regarding that anticipated motion, pursuant to Central District of California Local Rule 7-3.

As you know, the complaint you filed in Los Angeles Superior Court is only a "short form" complaint which does not contain any details about your allegations. The various longer versions of your complaint that you have emailed us have not been officially filed with the Court, and therefore they are not pleadings in the case that may be relied upon. Accordingly, you have not complied with the pleading standard of Federal Rule of Civil Procedure 8(a), which requires, among other things, a legally sufficient statement of your claims.

Riot plans to file its notice of removal on January 6, 2025, and its motion to dismiss on January 13, 2025. You may be able to correct the above deficiencies in your complaint by dismissing your state court action and filing a more detailed complaint in federal court, though we do not believe you will be able to state any viable or cognizable claims against Riot in any event. We reserve the right to move to dismiss any such further complaints you file.

We again encourage you to consult with an attorney about the procedural and substantive deficiencies in your case.

Sincerely,  
Josh Geller